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VIA ECF ONLY

Hon. Anne E. Thompson, U.S.D.J.
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Room 2020
Trenton, New Jersey 08608

Re: *Charles Novins, Esq., P.C. et al. v. Kevin A. Cannon, et al.*
Civil Action: 09-CV-5354-AET-DEA

Dear Judge Thompson:

At the close of Mr. Novins' case-in-chief, I made a motion on behalf of the Osterwalds for a directed verdict against Charles Novins personally. That motion was predicated upon the logic that because the Law Office of Charles Novins PC had defaulted in their answer to the counterclaim thereby admitting the veracity of the counterclaim, and because Charles Novins had admitted to writing all of the offending posts, sound logic dictated that Mr. Novins personally had responsibility for the admitted defamation and false light. Your Honor reserved upon this motion and did not render a decision after the jury returned their verdict. So that the judicial record can be complete for appellate purposes, I respectfully request that Your Honor enter a decision on the record on this motion.

Also, a motion was made prior to the conclusion of trial on behalf of the Osterwalds for monetary damages relating to the default of the Law Firm of Charles Novins PC on the counterclaim. Your Honor similarly reserved on this motion, and I respectfully request that the Court enter its determination of damages upon the record, so that the judicial record can be complete.

For purposes of both of these motions, the Osterwalds rely upon the previous argument and testimony made on the record before this Court.

Thank you.

Respectfully Submitted,



Joseph A. Manzo